Consultation Response from KC,
Lead Local Flood Authority

2022/93766 Syngenta Ltd, Leeds Road, Huddersfield, HD2 1FF

Erection of three industrial sheds on existing industrial site

Date Responded: 10th March 2023
Responding Officer: Paul Farndale
Responding Ref:

Further and in addition to our comments of 18th November 2022 requesting an updated FRA, the same FRA has been submitted albeit with appendices. Our OBJECTION stands.

- The site is subject to a sequential test. The planning officer needs to inform the EA and LLFA whether this has passed.

- A sequential approach has not been adhered to. The planning officer needs to inform the LLFA whether this is considered not reasonably practicable on this site and to consider mitigation techniques rather than avoidance techniques.

- The EA must comment on the fact the finished floor levels are lower than predicted flood levels used in the analysis. It appears that the applicant wished to rely on resistance and resilience techniques and visual monitoring of Lees Beck.

- The LLFA suggests in addition to the supplied material, the effects of a total blockage scenario should be considered although this is a main river and therefore under the jurisdiction of the Environment Agency as is any compensatory storage requirements.

- Surface water flooding is shown up to 600mm in depth for the 1 in 100-year event. Given the expected flood levels identified for main river flooding, any analysis for the latter will cover the risk of the former.

- No drainage estimation for storage requirements in line with our previous comments have been submitted. We wish the applicant to look at future development and amalgamated storage in this area. Brownfield discharge rates can be ignored due to demolition of older units being some time in the past as to ‘lose its place’ and to be considered ‘greenfield’ in drainage terms.